

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VALE S.A.,

Petitioner,

-against-

BSG RESOURCES LIMITED,

Respondent.

Case No. 19-cv-3619 (VSB)

**DECLARATION OF LISA VICENS IN SUPPORT OF VALE S.A.'S MOTION  
TO COMPEL COMPLIANCE WITH THE DISCOVERY REQUESTS  
TO BENJAMIN (BENY) STEINMETZ AS ALTER EGO OF BSGR**

I, Lisa Vicens, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury under the laws of the United States of America, to the best of my knowledge, information, and belief, as follows:

1. I am an attorney licensed to practice law in the State of New York and a member of Cleary Gottlieb Steen & Hamilton LLP, counsel for Petitioner Vale S.A. ("Vale") in the above-captioned action. I respectfully submit this Declaration and the attached Exhibits in support of Vale's Motion to Compel Compliance with the Discovery Requests to Benjamin (Beny) Steinmetz as Alter Ego of BSGR.

2. Attached hereto as Exhibit A is a true and correct copy of the [REDACTED]

3. Attached hereto as Exhibit B is a true and correct copy of email correspondence from [REDACTED]

[REDACTED]

4. Attached hereto as Exhibit C is a true and correct copy of [REDACTED], email correspondence between [REDACTED]

5. Attached hereto as Exhibit D is a true and correct copy of [REDACTED], an organizational chart of [REDACTED].

Dated: May 14, 2021  
New York, New York

/s/ Lisa Vicens  
Lisa Vicens